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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 JIANLIANG ZHU,

) No. C 08-0304 JCS

13 Plaintiff,

)

14 v.

) STIPULATION TO EXTEND DATES;
and [PROPOSED] ORDER

15 MICHAEL CHERTOFF, Secretary of the

)

Department of Homeland Security;

)

16 CHRISTINA POULOS, Director,

)

California Service Center, U.S.C.I.S.;

)

17 CONDOLEEZZA RICE, Secretary of State,

)

18 Defendants.

)

19
20 Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys
21 of record, hereby stipulate, subject to the approval of the Court, to the following:

22 1. Plaintiff filed this action on January 16, 2007 asking this Court to direct the United States
23 Citizenship and Immigration Services (USCIS) and the Department of State to adjudicate his I-824
24 application, and issue an immigrant visa to his son.

25 2. Pursuant to this Court's January 16, 2007 Order Setting Initial Case Management
26 Conference, the parties are required to file a joint case management statement on April 18, 2008
27 and attend a case management conference on April 25, 2008.

28 3. In order to allow sufficient time for USCIS and the Department of State to answer and

1 prepare a joint case management statement, and possibly administratively resolve the case, the
2 parties hereby respectfully ask this Court to extend the dates in the Court's scheduling order as
3 follows:

4 Last day to file Defendants' Answer: April 11, 2008
5 Last day to file Joint ADR Certification: April 18, 2008
6 Last day to file/serve Joint Case Management Statement: May 2, 2008
7 Case Management Conference: May 9, 2008, at 1:30 p.m.
8 Date: March 21, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney

11 /s/
12 EDWARD A. OLSEN
13 Assistant United States Attorney
14 Attorneys for Defendants

15 Date: March 20, 2008 /s/
16 JUSTIN X. WANG
17 Attorney for Plaintiff

18 ORDER

19 Pursuant to stipulation, IT IS SO ORDERED.

20 Date: March 24, 2008

